

P 155 325 237

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014

PS Form 380[®] Feb. 1982

Sent to <i>G. B. Hovess, V.P.</i>	
Street and No. <i>Trade Mineral Co.</i>	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date

4/18/86

SENDER'S COMPLIANCE FORM 2-8-84

By using this form, the sender certifies that the contents of the enclosed mail are not obscene, lewd, lascivious, filthy, abusive, defamatory, fraudulent, or otherwise in violation of the laws of the United States. The sender also certifies that the contents of the enclosed mail are not a violation of the laws of the United States.

☐ Return to sender if undeliverable at addressee's address

☐ Return to sender if undeliverable at addressee's address

ADDRESSEE'S NAME
G. B. Hovess, V.P.

ADDRESSEE'S ADDRESS
Trade Mineral Co.

ADDRESSEE'S CITY, STATE, AND ZIP CODE
Waco, TX 76798

DATE DELIVERED
4/18/86

SIGNATURE OF ADDRESSEE
G. B. Hovess

DATE OF RECEIPT
4/18/86

POSTMASTER'S OFFICE
Waco, TX

408

SPILL COLLECTION SUMP

406

10,000 GAL. MIXING TA

DRUM STORAGE

N 51° 14' 30" W

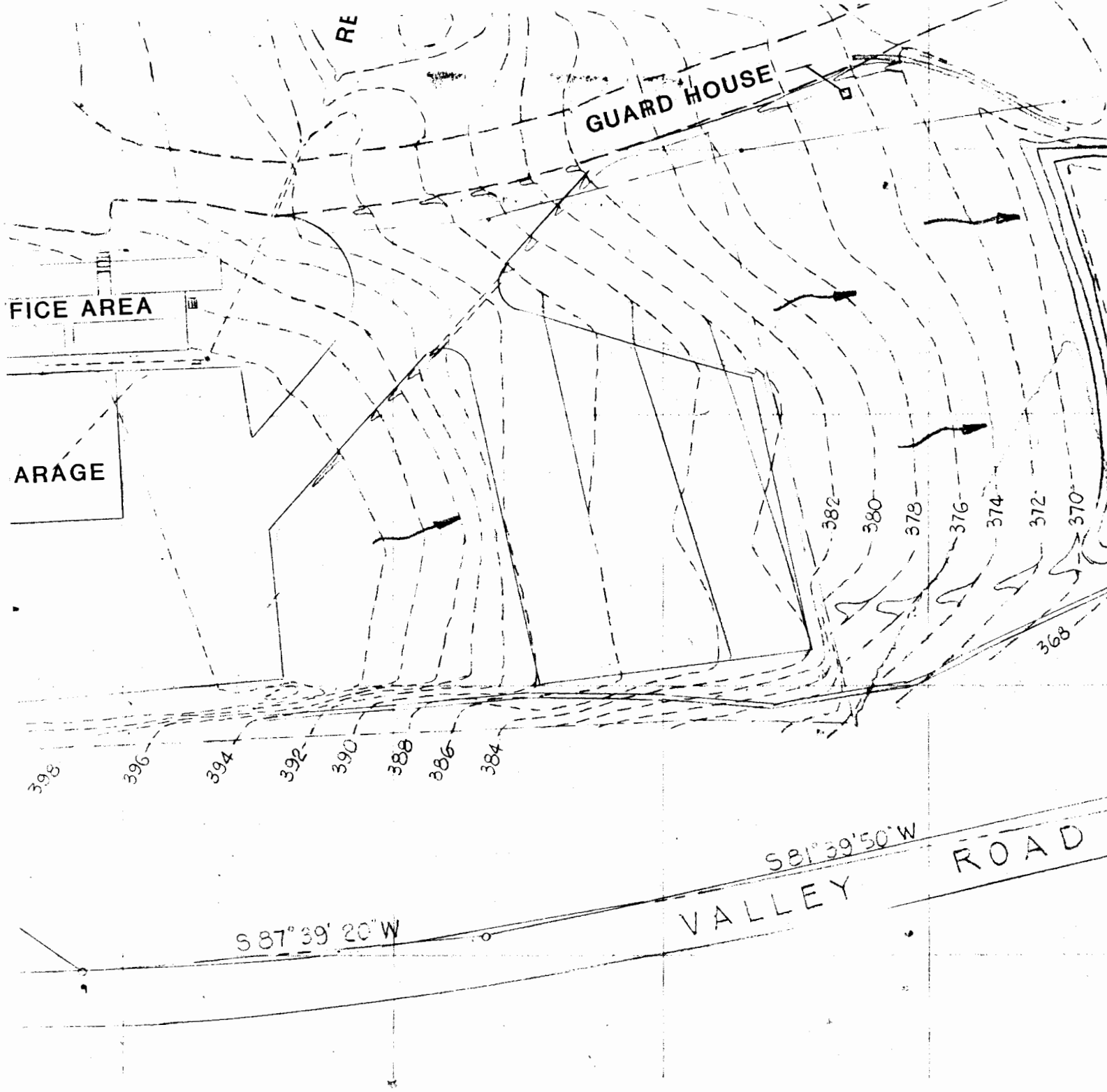
406

404

402

DELAWARE

VALLEY TOWNSHIP



CONTAINER CO. INC.

SHIP PENNSYLVANIA



CHECKED	DATE	CLIENT APPROVALS
<i>B.N.</i>	<i>4/24/85</i>	
DES. ENG.		
<i>D.C.</i>	<i>3/85</i>	
PROJ. ENG.		
	<i>4/24/85</i>	
PROJ. MGR.		
<i>B.K.</i>		



TOPOGRAPHIC MAP

DRAWN D.D. CASSLE, P.E.	DATE MARCH 1983	DWG. NO. 1153	REV. NO. 0
SCALE 1" = 50'	W.O. NO. 2125-05-01	SHT. _____ OF _____	

3 ST.

_____ - - - _____

PROPERTY LINE

_____ S _____

SANITARY SEWER

_____ SL _____ CO

SANITARY LATERAL
CLEANOUT (CO)

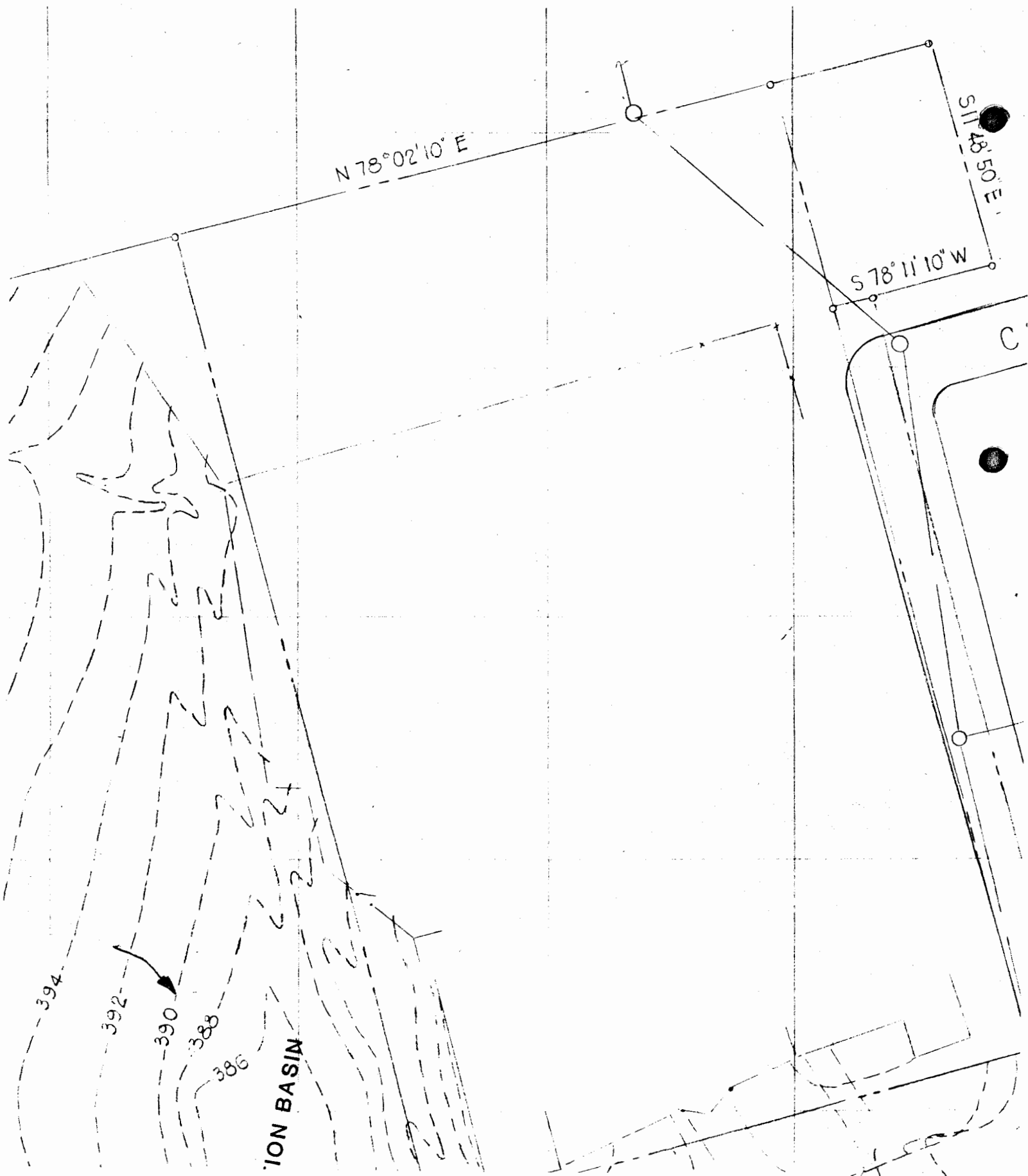
O

MANHOLE

_____ X _____

FENCE LINE

DIRECTION OF STORMWATER



RAILROAD

N 73° 21' 20" E

STORAGE TANKS

TRUCK UNLOADING

DRUM CRUSHER

SCRAP CONTAINER

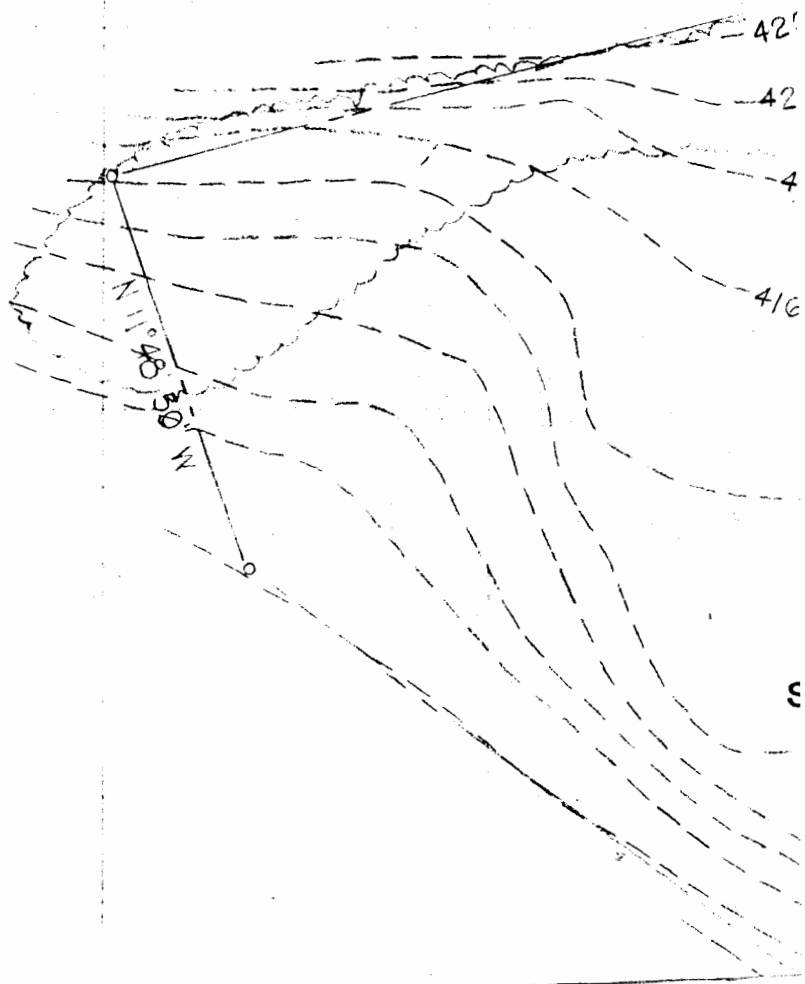
AY TANKS

RAMP

LECTION SUMP

DUST BOX

N DUST STORAGE BIN



CHECKLIST FOR SWMU RESPONSES

Name of Facility 7716 Mineral Company
 EPA I.D. # PND 079087989
 Date Received 5/17/88

1. Is facility currently storing less than 90 days. YES ☒ NO ☐

2. Did facility claim that they filed in error YES ☒ NO ☐

3. Description/Number of SWMU's 6
 Land Disposal _____ Incinerators _____ Tanks _____
 Land Treatment _____ Surface Impoundments _____ Drums _____
 Other carbons

4. Is there evidence of contamination YES _____ NO ☒
 Groundwater: YES _____ NO _____
 Surface Water: YES _____ NO _____
 Air: YES _____ NO _____

5. Certification YES ☒ NO ☐

6. PRIORITY

HIGH----Reported evidence of release to air, ground or surface water.

☒ MEDIUM--No releases reported but land based SWMUs reported.

LOW-----Everything else.

7. Comments:

1. Military base for processing
 and storage of minerals. Lepidolite
 and other minerals were captured
 in the base.
 2. Base was guarded in both
 directions.
 3. Base was used for processing



FOOTE MINERAL COMPANY

Route 100, Exton, Pennsylvania 19341

(215) 363-6500

Telex 835492

TWX 510-668-9142

9 May 1986

RECEIVED
SECTION
MAY 19 1986
EPA, R3

Mr. Stephen Wassersug
E.P.A.
841 Chestnut Building
Philadelphia, PA 19107

Dear Mr. Wassersug:

On 17 April you wrote asking a number of questions addressed for any industrial location that has hazardous waste. The Foote location you were asking about was the Frazer Plant.

To the best of our knowledge there are not any hazardous wastes impounded for permanent disposal at this site, and we are not seeking a permit. Part A application was filed for this site on 2 July 1985. Subsequent review and legal opinion led to the conclusion that the site does not require permitting and a letter to that effect was sent to Ms. Shirley Bulkin of your office on 17 January 1986. Therefore, to the best of our knowledge the site never operated under interim status, nor is it expected to do so.

Attached is a topographic map of the plant area. No hazardous waste deposits are shown since we believe no hazardous waste impoundments exist.

On 14 January 1986 we received from your contractor, N.U.S. Corporation of Wayne, PA, a letter attaching a map of the Frazer Plant area marking seven areas that they thought might represent waste areas or lagoons numbered 1 to 7. You may know that before Foote bought the property in 1941 that limestone had been quarried at the site represented by location #5 and #6. In the period 1972-1975 Foote cooperated with Pennsylvania DER in terminating a practice of putting mineral waste and process water into #5, the wet quarry. After this no solid wastes were added to the site and all process waters have been monitored in a holding basin which we believe is Pond #1 on the N.U.S. map. The effluent from Pond #1 conforms to our NPDES permit, and it enters Vally Creek. In the period of 1955-1968 Foote crushed significant tonnages of an insoluble mineral, lepidolite, and some of the fines were captured in ponds 2, 3 and 4.

About 1975 these (dry) ponds were leveled to remove the contours as a nuisance. The normal composition of lepidolite is $\text{KLi}_2\text{Al}(\text{Si}_4\text{O}_{10})(\text{OH})_2$. No toxic elements are leached with groundwater exposure.

In the period 1951-1957 a lithium hydroxide manufacturing operation was conducted at Frazer which resulted in the discharge of on the order of 60,000 tons of calcium aluminum silicate into the main quarry pit numbered #5. The one soluble element that has been monitored ever since in observation wells is lithium. The water table in the vicinity of the plant is currently reacting more to minimal losses from fugitive dusts in the manufacturing areas than any residual solubility from solid wastes that were last emplaced about 1957.

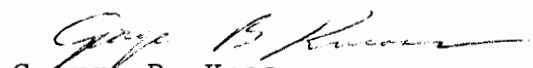
Area #6 has been referred to as the dry quarry. For the last twenty years the area has been fenced and nothing has been put in. Before that there had been some accumulation of rubbish and an occasional load of cleanup solids. Since the materials that we know of that could have been put into the dry quarry are not now on the hazardous waste list we believe that it does not meet the definition of a hazardous waste area.

Area #7 was an equipment wash pond for a very small scale metal production area. Manufacture stopped about 16 years ago. No solvents or hydrocarbons were used in the operation. The surface was leveled to avoid a nuisance about 13 years ago.

Certification 270.11(d)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Very truly,


George B. Kneass
Vice President - Production

GBK:jc
Attachment

cc: Mr. L. Lunsck, Pennsylvania DER
1875 New Hope Street, Norristown, PA 19401

R. S. Young
E. A. Gadsby
R. N. Jacobson
D. B. Coghlan

APR 1 1980

In Reply Refer To: 3HW33

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. G. B. Kiveass, Vice-President
Foote Mineral Co. Frazer
15 S. Bacton Hill Road
Frazer, PA 19355

Re: PAD 077087989

Dear Mr. Kiveass:

Sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) give EPA the authority to require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit ("SWMU") as defined on the enclosed sheet. This requirement applies to operating units, inactive units, as well as those that are closing or have been closed in the past.

EPA and the State must first determine the location of all SWMUs at your facility. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you must provide the following information:

- (1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one-inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former SWMUs at your facility.
- (2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

a copy of the closure plans, a description of how closure was performed and any relevant post-closure information you have available.

- (3) For each SWMU, provide a description of all solid wastes including hazardous wastes and hazardous waste constituents received by the units. Also, provide information on quantities of hazardous wastes and hazardous waste constituents received by each SWMU and the dates during which these units operated.
- (4) For each solid waste, SWMU, describe any releases (or possible releases) originating at the unit. This should include information on the date of release, type of solid waste, hazardous waste or hazardous waste constituents released, quantity released, nature of the release, extent of migration, and cause of release, for example, an overflow, broken pipe, tank leak, etc. Also, provide any available data which would quantify the nature and extent of environmental contamination including the results of soil, surface water and/or ground water sampling and analysis efforts. Likewise, any monitoring information that indicates releases are not present should also be submitted.

Please be advised that § 3004(u) applies to those treatment/storage/disposal facilities required to obtain RCRA permits. If you are not required to obtain a RCRA permit, please indicate that fact in your response.

Additionally, § 3008(h) applies to all facilities that operated under interim status. In some cases, this provision will not apply to a facility because it never actually operated under interim status; for example, a storage facility that filed for interim status, but never stored for more than 90 days. If you determine that this provision does not apply to your facility, you must list specific reasons that support the fact that you never operated under interim status.

If some or all of the above requested information has been previously submitted to this office, please reference this information in your reply.

We request under Section 3007 of the Act, 42 U.S.C. § 6927, that you submit two copies of the above requested information within forty-five (45) days of your receipt of this letter to both EPA and the Pennsylvania Department of Environmental Resources (PA DER).

All information you submit should be certified as required by regulation 40 C.F.R. 270.11(d). Should you have any questions concerning this letter, please contact Samuel Israel at (215) 597-9809.

Sincerely,

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Enclosure

cc: Mr. Donald Bruce, Manager
Foote Mineral Co. Frazer
15 S. Bacton Hill Road
Frazer, PA 19355

PA DER - Norristown